IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

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)	No. 18-cv-6675
)	Judge Joan B. Gottschall
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PLAINTIFF'S MOTION FOR LEAVE TO FILE SUR-REPLY MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANTS' MOTION TO DISMISS THE FOURTH AMENDED COMPLAINT

Plaintiff D.W., by his legal guardian Shaniece Mathews and the undersigned counsel, respectfully moves for leave to file the attached Exhibit A as a sur-reply memorandum of law in opposition to the Defendants' Motion to Dismiss the Fourth Amended Complaint. In support of this motion, Plaintiff states:

- 1. Attached as Exhibit A is a short sur-reply memorandum of law addressing the Reply Memorandum of Defendants filed on March 29, 2024.
- 2. The proposed sur-reply attached as Exhibit A seeks to aid the Court by summing up the major differences between the parties.
- 3. Given the major differences between the parties, Plaintiff also believes that oral argument would assist the Court, and respectfully requests that the Court schedule oral argument on Defendants' Motion to Dismiss.
 - 4. Defendants oppose the filing of this motion.

WHEREFORE, Plaintiff respectfully seeks leave to file the attached Exhibit A.

Dated: May 1, 2024

Respectfully submitted,

By: /s/ *Thomas H. Geoghegan*One of Plaintiff's Attorneys

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